

<b><i>Tier I Pre-Settlement Discovery</i></b>	<b><i>Proposed Deadline</i></b>
Initial Disclosures	June 26, 2017
Completion date for Phase I Discovery (Reciprocal and agreed upon document production, generally not including depositions, unless otherwise agreed. No more than 30 days after Initial Conference)	n/a (see Stipulation ¶ 2, Docket No. 23 )
Status conference (Generally 15 days post Tier I Discovery)	July 13, 2017
<b><i>Tier II Discovery and Motion Practice</i></b>	
Motion to join new parties or amend the pleadings: (Presumptively 15 days post status conference)	November 24, 2017
First requests for production of documents and for interrogatories due by: (Presumptively 15 days post joining/amending)	August 25, 2017
All fact discovery completed by: (Presumptively 3.5 months post first requests for documents/interrogatories )	June 29, 2018
Exchange of expert reports completed by: (Presumptively 30 days post fact discovery)	July 27, 2018
Rebuttal expert reports completed by:	August 31, 2018
Expert depositions completed by: (Presumptively 30 days post expert reports)	September 28, 2018
Final date to take first step in dispositive motion practice: (Parties are directed to consult the District Judge's individual rules regarding such motion practice. Presumptively 30 days post expert depositions)	September 28, 2018
COMPLETION OF ALL DISCOVERY BY: (Note: Presumptively 9 months after Initial Conference.)	September 28, 2018
Submission of joint pre-trial order	TBD
Final Pre-Trial Conference TBD by the court:	TBD

Dated: June 7, 2017

Respectfully submitted,

/s/ Steven M. Kaplan (w/permission)

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